

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

| | | |
|-----------------------------------|---|----------------------|
| CRYSTALLEX INTERNATIONAL CORP., |) | |
| |) | |
| Plaintiff, |) | |
| |) | |
| v. |) | Misc. No. 17-151-LPS |
| |) | |
| BOLIVARIAN REPUBLIC OF VENEZUELA, |) | |
| |) | |
| Defendant. |) | |

**SPECIAL MASTER’S MOTION TO EXPEDITE RESPONSES ON HIS MOTION FOR
AUTHORIZATION TO LAUNCH THE MARKETING PROCESS**

Special Master Robert B. Pincus (the “Special Master”) respectfully requests the Court order expedited briefing concerning the concurrently filed Motion for Authorization to Launch the Marketing Process (“Motion to Launch”).¹ Expedited briefing is necessary to launch the Marketing Process on October 23, 2023, the date previously set by the Court. *See* D.I. 643. Absent an order granting the requested relief, briefing pursuant to D. Del. LR 7.1.2 would not be complete until November 1, 2023. To complete briefing related to the Motion to Launch with sufficient time for the Court to rule prior to the contemplated Launch Date, the Special Master requests the Court shorten the response periods for the Motion to Launch so that responses, if any, must be filed on or before October 16, 2023 at 4:00 p.m. ET and the Special Master’s reply, if any, must be filed on or before October 18, 2023 at 4:00 p.m. ET.

No party will suffer prejudice from granting expedited treatment of the Motion to Launch because the Launch Date has been set for months, and the parties have already submitted their

¹ Capitalized terms used but not defined herein shall have the meanings ascribed to them in the *Sixth Revised Proposed Order (A) Establishing Sale and Bidding Procedures, (B) Approving Special Master’s Report and Recommendation Regarding Proposed Sale Procedures Order, (C) Affirming Retention of Evercore as Investment Banker by Special Master and (D) Regarding Related Matters* [D.I. 481] or the Motion to Launch, as applicable.

respective positions to the Court regarding whether and when the Court should set the Launch Date. *See* D.I. 561, 562, 583.

Pursuant to D. Del. LR 7.1.1, the Special Master, through his counsel, met and conferred with the Sale Process Parties regarding the relief sought in the Motion to Launch and this motion for expedited treatment, none of whom objected to the Court granting such relief.

For the foregoing reasons, the Special Master respectfully requests that this Court grant expedited treatment of the Motion to Launch.

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Dated: October 11, 2023

/s/ Myron T. Steele

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Counsel for Special Master Robert B. Pincus

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[PROPOSED] ORDER

WHEREAS, the Special Master filed his Motion to Expedite Responses on the Motion for Authorization to Launch the Marketing Process.

IT IS HEREBY ORDERED his ____ day of October 2023 that the Special Master's Motion is GRANTED:

1. Responses to the Motion for Authorization to Launch the Marketing Process shall be filed on or before October 16, 2023 at 4:00 p.m. ET.
2. The Special Master's reply in support of the Motion for Authorization to Launch the Marketing Process shall be filed on or before October 18, 2023 at 4:00 p.m. ET.

HONORABLE LEONARD P. STARK
UNITED STATES DISTRICT COURT